

PRESENTMENT DATE AND TIME: January 12, 2017 at 12:00 noon (Eastern Time)
RESPONSE DATE AND TIME: January 5, 2017 at 5:00 p.m. (Eastern Time)

KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036
Telephone: (212) 556-2100
Arthur Steinberg, Esq.
Scott Davidson, Esq.

KENNEDY, JENNIK & MURRAY PC
113 University Place
New York, New York 10003
Telephone: (212) 359-1500
Thomas M. Kennedy, Esq.

*Attorneys for Defendant, General Motors LLC
(f/k/a General Motors Co.)*

Attorneys for Plaintiffs

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
In re:	:
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	:
-----X	
IUE-CWA, INDUSTRIAL DIVISION OF THE	:
COMMUNICATION WORKERS OF AMERICA,	:
AFL-CIO and LARRY E. SHORT, LESLIE CASH,	:
and GARY ROBINSON on behalf of themselves,	:
and all others similarly situated,	:
	:
Plaintiffs,	:
	:
-v-	:
	:
GENERAL MOTORS CO.,	:
	:
Defendant.	:
-----X	

**NOTICE OF PRESENTMENT OF ORDER APPROVING A SETTLEMENT AMONG
GENERAL MOTORS CO., THE PLAINTIFFS, AND OTHER SPLINTER UNIONS**

PLEASE TAKE NOTICE that based on the attached joint motion, a proposed *Order Approving A Settlement Among General Motors Co., The Plaintiffs, And Other Splinter Unions*, a copy of which is attached to the joint motion as Exhibit "B," will be presented for signature

and entry to the Honorable Martin Glenn, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 on **January 12, 2017 at 12:00 noon (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that objections or responses must be made in writing and shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), Word, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) King & Spalding LLP, 1185 Avenue of the Americas, New York, New York 10036 (Attn: Arthur Steinberg, Esq.); and (ii) Kennedy, Jennik & Murray, P.C., 113 University Place, 7th Floor, New York, New York 10003 (Attn: Thomas M. Kennedy, Esq.), so as to be received no later than **January 5, 2017, at 5:00 p.m. (Eastern Time)** ("**Objection Deadline**").

PLEASE TAKE FURTHER NOTICE that if an objection or response is timely filed before the Objection Deadline, the Court may schedule a hearing thereon at a date and time to be determined, if it believes such hearing is necessary under the circumstances.

Dated: New York, New York
December 22, 2016

Respectfully submitted,

/s/ Arthur Steinberg
Arthur Steinberg
Scott Davidson
KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222

*Attorneys for Defendant, General Motors LLC
(f/k/a General Motors Co.)*

By: /s/ Thomas M. Kennedy
Thomas M. Kennedy
KENNEDY, JENNIK & MURRAY PC
113 University Place
New York, New York 10003
Telephone: (212) 358-1500

Attorneys for Plaintiffs